RESOLUTION AGREEMENT
The School District of Philadelphia
OCR Case Number 03-24-1286

The School District of Philadelphia (the District) agrees to resolve the above-referenced complaint by voluntarily entering into this Resolution Agreement (Agreement) with the U.S. Department of Education, Office for Civil Rights (OCR). This Agreement does not constitute an admission of liability, non-compliance, or wrongdoing by the District. The District assures OCR that it will take the following actions to resolve this complaint and to ensure compliance with the requirements of Title VI of the Civil Rights Act of 1964 (Title VI) and its implementing regulation at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, or national origin, including shared ancestry or ethnic characteristics, by recipients of Federal financial assistance.

A. ANTI-HARASSMENT STATEMENT

1. The Superintendent will issue a statement that will be published on the District's website, printed or linked in appropriate publications targeted to reach all District parents/guardians, students, and employees, and posted in prominent locations at each school, stating that the District does not tolerate acts of harassment, including acts of harassment based on a student's actual or perceived race, color, or national origin, including shared ancestry or ethnic characteristics (e.g., antisemitism). The statement will encourage any student who believes he or she has been subjected to harassment or a hostile environment based on race, color, or national origin to report it to the District and identify the process that should be used to file such complaints. It will state the District's commitment to conducting a prompt investigation. The statement will warn that students found to have engaged in acts of harassment that create a hostile environment based on race, color, or national origin may be disciplined and make clear that such discipline may include, if circumstances warrant, suspension and expulsion. The statement will encourage students, parents/guardians, and District staff to work together to prevent acts of harassment.

Reporting Requirements:

1. Within 30 days after the date of execution of this Agreement, the District will submit to OCR a draft statement written pursuant to Action Step A.1. The District will promptly and fully address OCR's feedback, if any, until the District receives OCR's final approval of the statement and notice from OCR that no further reporting is required for Reporting Requirement A.1.

2. Within 30 calendar days of receiving OCR's final approval of the statement, the District will submit to OCR documentation which demonstrates the District has distributed the statement pursuant to Action Step A.1, including website links and other evidence of distribution. The District will promptly and fully address OCR's concerns, if any, until the District receives notice from OCR that no further reporting is required for Reporting Requirement A.2.

B. POLICY REVIEW AND REVISION

1. The District will review its policies and procedures, as necessary, to adequately address the Title VI prohibition on discrimination based on race, color, and national origin, including discrimination based on a student's actual or perceived shared ancestry or ethnic characteristics, including Policy 248 and its Administrative Procedures. During its review, if it had not already done so, the District will identify the relevant policies and procedures currently in effect; timely revise the policies and procedures, as described below; timely present the policies to the Board of Education ("Board") for adoption and; disseminate the adopted revised policies and their administrative procedures by email distribution to all school administrators who will be directed to distribute, convene, and discuss the revised policies and procedures with site-based staff. The dissemination will include a web link to the District webpage containing the revised policies and procedures.

   At a minimum, the District review will ensure its policies and procedures include the following:

   a. Non-discrimination and reporting.

      i. A statement setting forth the District's commitment to having a school environment free from all discrimination, including harassment on the basis of race, color, and national origin, including on the basis of shared ancestry and ethnic characteristics. The statement must explain that the District prohibits harassment based on race, color, and national origin, including shared ancestry and ethnic characteristics, in the school environment, including all academic, extra-curricular and school-sponsored activities. The statement will encourage students to immediately report incidents of harassment. The statement will emphasize that staff must promptly report to the designated District or School administrator(s)/staff member(s) all incidents of harassment of which they become aware, regardless of whether a formal complaint is filed. The statement will specify that the District will investigate formal and informal complaints of harassment.
      ii. An explanation of the right to file a formal complaint pursuant to the District' policies and procedures and be offered a copy of the procedures.
      iii. A requirement that school personnel report incidents of possible harassment involving students and possible harassment involving staff that may be based on race, color, and/or national origin that school personnel witness or of which they have received reports or information, whether such incidents are verbal or physical or amount to harassment in other forms.
      iv. Examples of the type of harassing conduct and behavior that is covered by the non-discrimination policy, including examples of harassment on the basis of shared ancestry and ethnic characteristics.
      v. A statement that retaliation is prohibited against persons who report harassment or participate in related proceedings.

   b. Complaint Procedures.

i. A definition of the term harassment.
ii. The name or title, office address, and telephone number for the District employee(s) responsible for receiving and investigating reports of harassment on the basis of race, color and national origin, including on the basis of shared ancestry and ethnic characteristics.
iii. A description of the procedures that will be used to receive, investigate and resolve complaints, including how to file complaints, the availability of interim measures (including safety plans), the steps that will be taken as part of the complaint investigation, and notice of the outcome to the parties. At a minimum, the description of the procedures will include the following:
    1. A requirement that all interviews with individuals who have information about the complaint, including but not limited to, the complainant, the person accused of discrimination, witnesses, and anyone mentioned as having relevant information, will be documented in writing or other recording.
    2. Review of any records, notes, statements, or other documents related to the complaint.
    3. Notice, to the extent permitted by applicable laws, of the outcome of the complaint, including:
        (a) The findings of fact based on the evidence gathered;
        (b) As to each allegation, the District's conclusion(s) as to whether discrimination and/or harassment occurred, and the reasons or rationale for such conclusion(s);
        (c) The consequences imposed on any individual(s) found to have engaged in discrimination and/or harassment that relate to the subject of the complaint; and,
        (d) Notice to the complainant to immediately report any recurrence of the conduct or of acts of retaliation to the District.
    4. An express commitment that after a finding of discrimination and/or harassment, the District will take appropriate remedial action to eliminate the discriminatory conduct, to prevent its recurrence, and to address its effects on the complainant and any other affected individuals.

Reporting Requirements:

1. **By January 9, 2025,** the District will submit to OCR documentation which demonstrates the District has: (i) identified all relevant policies and procedures; and (ii) revised Policy 248 and its Administrative Procedures pursuant to the requirements in Action Step B.

    A. The District will include in its submission to OCR a draft of the proposed revisions for Policy 248 and its Administrative Procedures for OCR's review and approval. The District will submit the revised Policy 248 and its Administrative Procedures by submitting a: (i) red-lined version of the proposed changes, and (ii) clean copy of the proposed final policy and procedures. The District will promptly and fully address OCR's feedback, if any, until the District receives OCR's final

approval of the revised Policy 248 and its Administrative Procedures. The District will then present Policy 248 for approval by the Board in accordance with Policy 3.2 and its Operating Guidelines, consistent with the Board's Policy Committee cycle and Board meeting schedule.

B. After OCR has approved Policy 248, the District will revise the remaining policies identified in Action Step B, if any, and present them to OCR for feedback within 90 days of the OCR's approval of Policy 248. The District will promptly and fully address OCR's feedback, if any, until the District receives OCR's final approval of the revised additional policies. Within 120 days after receiving OCR's final approval of those policies, the District will present those policies for approval by the Board in accordance with Policy 3.2 and its Operating Guidelines, consistent with the Board's Policy Committee cycle and Board meeting schedule.

2. Within 45 calendar days of receiving OCR's final approval of the revised Policy 248, the District will submit to OCR documentation which demonstrates the District has presented Policy 248 for formal-adoption in accordance with Policy 3.2 and its Operating Guidelines, consistent with the Board's Policy Committee cycle and Board meeting schedule and within 45 days of obtaining Board approval documentation demonstrating that the District disseminated the adopted Policy 248 and procedures in accordance with Action Step B.1. The District will promptly and fully address OCR's concerns, if any, until the District receives notice from OCR that no further reporting is required for Reporting Requirement B.2.

3. Within 120 calendar days of receiving OCR's final approval of the other revised policies identified in Action Step B.1, the District will submit to OCR documentation which demonstrates the District has presented the other revised policies for formal~~ly~~ adoption in accordance with Policy 3.2 and its Operating Guidelines, consistent with the Board's Policy Committee cycle and Board meeting schedule, and within 45 days of obtaining Board approval documentation demonstrating that the District has disseminated the adopted policies and procedures in accordance with Action Step B.1. The District will promptly and fully address OCR's concerns, if any, until the District receives notice from OCR that no further reporting is required for Reporting Requirement B.3.

C. RECORD-KEEPING

1. The District will develop or revise its procedure for documenting the date and substance of each report or complaint of harassment received by the District, and actions taken by the District in response to the report or complaint, including: internal correspondence; discussions involving compliance coordinators and/or staff involved in the investigative or disciplinary process; correspondence or dialogue with parties, witnesses, and/or other individuals and/or entities; interim or supportive measures offered or provided to parties; interim restrictions, including no-contact orders, (if any) and justification for same; informal resolutions; investigations conducted, including evidence gathered; findings or determinations of responsibility at each stage, including on appeal, if applicable; post-investigation remedies; written notice of the outcome provided to the parties; and

disciplinary sanctions imposed. The District will also maintain these records in a manner that permits the District to readily identify all reports and complaints alleging harassment or possible harassment on the basis of race, color, or national origin, including harassment based on a student's actual or perceived shared ancestry or ethnic characteristics.

Reporting Requirements:

1. **By May 16, 2025,** the District will provide to OCR for review and approval the detailed description of its system for tracking and reviewing the records as described in Action Step C. The District will promptly and fully address OCR's feedback, if any, until the District receives OCR's final approval of the record-keeping system and notice from OCR that no further reporting is required for Reporting Requirement C.1.

2. Within 60 days of OCR's approval of the record-keeping system, the District will implement the system at the District and provide verification to OCR that the system has been implemented for all District administrators and staff involved in the investigative process.

D. TRAINING OF SCHOOL STAFF

1. The District will annually train all administrators, and full-time District employees on Title VI's prohibition of discrimination based on race, color, and national origin, including on the basis of shared ancestry and ethnic characteristics. The first training may occur either in-person, virtually, or asynchronously and will include, at a minimum:

   a. Title VI's prohibition on discrimination based on race, color, and national origin, including harassment based on shared ancestry or ethnic characteristics;
   b. relevant District policies and regulations, including the District's revised policies and procedures under Action Step B, and the District's reporting process for incidents of harassment under Action Step C;
   c. the definition of "harassment" and examples of harassment on the basis of race, color, and national origin, including shared ancestry and ethnic characteristics;
   d. a statement of District personnel's responsibility to report incidents of possible harassment, the procedures for doing so, and instructions on how to recognize, prevent, and respond appropriately to such reports;
   e. a statement of the requirement that a student or parent/guardian who has reported possible incidents of harassing behavior must be notified of their right to file a formal complaint pursuant to the District' policies and procedures, and be offered a copy of the procedures;
   f. identification of the individual, by name or title, and contact information, responsible for receiving and investigating reports of harassment; and
   g. a form for each person taking the training to submit questions to which the District will respond directly and by posting an FAQ document which will be shared via email communication to all employees.

2. The District will assess the effectiveness of the training referenced in Action Step D.1 by conducting training assessment surveys at the conclusion of the training each year, of all staff who attended the training(s). The survey will specifically inquire about their knowledge and perceptions about their obligation to report all allegations of possible harassment on the basis of race, color, and national origin, including shared ancestry and ethnic characteristics, and the process for doing so, and will specifically inquire about their knowledge of the process for responding to and investigating such harassment complaints.

Reporting Requirements:

1. Within 60 calendar days of receiving OCR's approval of the District's revised Policy 248 under Action Steps B, the District will submit to OCR draft training materials, a draft survey for assessing the effectiveness of the training, and the name(s), title(s)/position(s), and qualifications of one or more qualified individuals who provided guidance or feedback in drafting the training and survey under Action Step D.1 and D.2, for OCR review and approval. The District will promptly and fully address OCR's feedback, if any, until the District receives OCR's final approval of the training and survey materials.

2. By September 30, 2025 or within 120 days after receiving OCR's final approval of the training and survey materials, whichever is later, the District will ensure that all individuals who are full-time District employees as of August 1, 2025 are trained and will submit to OCR: (i) the date, time, and location of the training; (ii) confirmation that the approved training materials were used; (iii) the names and titles/positions of staff who took the training; and (iv) the names and titles/positions of staff who did not take the training, and a plan to train each person. Notwithstanding the dates and requirements set forth earlier in Action Step D and this paragraph, the first training requirement may be met by employees who have taken the existing training offered in the 2024-2025 school year if OCR determines that that training is sufficiently similar to the training approved by OCR pursuant to Reporting Requirement D.1. The District will promptly and fully address OCR's feedback, if any, until the District receives notice from OCR that no further reporting is required for Reporting Requirement D.2.

3. At the same time as the training is offered or within 30 calendar days of completing the training required under Action Step D.1, the District will disseminate the survey to all staff who were reported in Reporting Requirement D.2. as having been trained.

4. Within 60 calendar days of disseminating the survey required by Action Step D.2, and by November 30, 2025 and 2026, the District will provide OCR with the survey results regarding the effectiveness of the training and a summary of the steps the District plans to take, if any, to address the survey results. The District will promptly and fully address OCR's feedback on the results of the assessment survey, including the potential need for additional training, until the District receives OCR's final approval that no further action or reporting is required for this item.

E. INVESTIGATIVE TRAINING OF DISTRICT ADMINISTRATORS

1. The District will annually train District school-level administrators, who are directly involved in processing, investigating, and/or resolving complaints and other reports of discrimination based on race, color, and national origin, including harassment based on shared ancestry and ethnic characteristics. The first training will occur after the District has adopted Policy 248 under Action Step B and the record keeping system under Action Step C. The training may occur either in-person, virtually, or asynchronously at the District's discretion, and will include, at a minimum:

    a. A review of the District's policies and procedures, including the District's record-keeping processes under Action Step C, that focus specifically on the investigation of discrimination complaints, including instructions on how to conduct and document reliable and impartial investigations of possible discrimination on the basis of race, color, and national origin, including harassment on the basis of shared ancestry and ethnic characteristics;
    b. A description of the steps the District will take in response to any harassing behavior discovered, including actions designed for the offending student(s) to understand the seriousness of the possible offense and, the possible disciplinary actions or steps; and
    c. A statement that a student or parent/guardian who has reported possible incidents of harassing behavior must be notified of the steps the District is taking in response to the reported incident(s), and guidance to staff on how and when to provide this notification.

    Reporting Requirements:

    1. Within 90 calendar days of receiving OCR's approval of the District's revised Policy 248 under Action Step B, and the record-keeping process under Action Step C, the District will submit to OCR draft training and survey materials and the name(s), title(s)/position(s), and qualifications of one or more qualified individuals who provided guidance in drafting the training and survey under Action Step E. The District will promptly and fully address OCR's feedback, if any, until the District receives OCR's final approval of the training materials,

    2. By September 30, 2025 or within 120 days after receiving OCR's final approval of the training and survey materials, whichever is later, the District will ensure that administrators at each school are trained and will submit to OCR: (i) the date, time, and location of the training; (ii) confirmation that the approved training materials were used; (iii) the names and titles/positions of staff who took the training; and (iv) the names and titles/positions of school administrators who did not take the training, and a plan to train each person. The District will promptly and fully address OCR's feedback, if any, until the District receives notice from OCR that no further reporting is required for Reporting Requirement E.2.

    3. Within 30 calendar days of completing the training required under Action Step E.1, the District will disseminate the survey to all administrators who were trained.

4. Within 60 calendar days of disseminating the survey required by Reporting Requirement E.3, and by November 30, 2025 and 2026, the District will provide OCR with the survey results regarding the effectiveness of the training. The District will promptly and fully address OCR's feedback on the results of the assessment survey, including the potential need for additional training, until the District receives OCR's final approval that no further action or reporting is required for Reporting Requirement E.3.

F. STUDENT INFORMATIONAL PROGRAM

1. The District will provide an age-appropriate informational program for all 6th through 12th grade District students to address discrimination based on race, color, and national origin, including harassment based on shared ancestry and ethnic characteristics. The program will occur after the District has adopted the revised Policy 248 under Action Step B and will include, at a minimum:

   a. A reminder of the District's commitment to having a school environment free from discrimination, including harassment based on shared ancestry and ethnic characteristics, and explain to students what they should do if they believe they or other students are being harassed based on race, color, or national origin or experiencing retaliation;
   b. An explanation that harassment is prohibited pursuant to the District's policies and procedures;
   c. Examples of the type of harassing conduct and behavior that is covered by the policy, including examples of harassment based on shared ancestry and ethnic characteristics;
   d. An explanation that students who are aware of harassment should promptly report the harassment to the District and details about how students should report harassment, on the basis of race, color, and national origin, including on the basis of shared ancestry and ethnic characteristics;
   e. An explanation regarding the potential disciplinary consequences related to findings of discrimination on the basis of race, color, and national origin, including harassment on the basis of shared ancestry and ethnic characteristics; and,
   f. A notice of how to access the District's revised policies and procedures under Action Step B, as approved by OCR.

Reporting Requirements:

1. Within 120 calendar days of receiving OCR's approval of the District's revised Policy 248 under Action Step B, the District will submit to OCR draft program materials and the name(s), title(s)/position(s), and qualifications of one or more qualified individuals who assisted with or provided feedback or guidance in developing the program materials. The District will promptly and fully address OCR's feedback, if any, until the District receives OCR's final approval of the program materials and facilitator(s).

2. After receiving OCR's final approval of the program materials but not later than the end of the 2024-2025 school year, the District will provide all 6th through 12th grade

students with the opportunity to attend the program at their school. No later than August 30, 2025, the District will submit to OCR: (i) the date, time, and location of each program; (ii) confirmation that the approved program materials were used; (iii) the names and grades of students who attended the program; and (iv) the names and grades of each student who was absent on the day the program was provided and evidence that the program was provided to each such student via electronic or physical distribution of age-appropriate informational materials. The District will promptly and fully address OCR's feedback, if any, until the District receives notice from OCR that no further reporting is required for Reporting Requirement F.2.

G. AUDIT FOR THE 2022-2023 AND 2023-2024 SCHOOL YEARS

1. The District will review its response to reports of discrimination and/or harassment on the basis of shared ancestry received during the 2022-2023 and 2023-2024 school years, to ensure that the District made a determination regarding whether the conduct alleged by the report or reports created a hostile environment within the District's education program or activities, even where the conduct occurred off campus or on social media. If the District's review reveals that it did not complete such a determination for any conduct reported during the 2022-2023 and 2023-2024 school years, the District will promptly make a determination regarding whether the alleged conduct created a hostile environment within the District's education program or activities, and will provide the known student Complainant and/or known Respondent, if any, with notice of its determination if a hostile environment was determined to have existed. For each incident, the District will make a legal determination of whether the alleged conduct was unwelcome based on the totality of the circumstances, both subjectively and objectively offensive, and so severe or pervasive that it limited or denied a student's ability to participate in or benefit from the District's program or activity. Where the District determines that the conduct alleged created or contributed to a hostile environment on the basis of shared ancestry, the District will propose remedies to redress the hostile environment.

Reporting Requirements:

1. **By June 30, 2025** the District will provide to OCR documentation of its review pursuant to Action Step G, including a description of the information relied upon in making its determination, and a summary of its determination, including proposed remedies to redress the hostile environment where the District determines that the conduct alleged created or contributed to a hostile environment based on shared ancestry.

2. Within 45 days of OCR's review and approval of the District's submission(s) pursuant to Reporting Requirement G.1, the District will provide OCR with documentation showing that it provided notice required by Action Step G, and documentation of implementation of the proposed remedies.

H. AUDIT FOR THE 2024-2025 SCHOOL-YEAR

1. At the end of the 2024-2025 school year, the District will conduct an audit of each school that serves any students in grades ranging from 6th through 12th grades to review the consistency of the application of and compliance with the District's policies and procedures regarding non-discrimination on the basis of race, color, and national origin, including harassment on the basis of shared ancestry and ethnic characteristics. The District will complete the audit no later than August 30, 2025. The audit will include, at a minimum:

    a. a review of all complaints received by those schools during the school year addressing discrimination on the basis of race, color, and national origin, including harassment on the basis of shared ancestry and ethnic characteristics;
    b. an assessment of whether each complaint was processed in accordance with the District's policies and procedures; and,
    c. a self-evaluation by the District with regard to any areas of concern arising based on the review and analysis outlined above, including recommendations for the subsequent school year.

2. Upon completion of the audit, the District will generate a report summarizing the audit's findings, addressing areas of concern, and identifying recommendations for improvement, if any. The report will be distributed through written correspondence and/or email to appropriate staff, including the Superintendent, Deputy Superintendents, Associate Superintendents, Assistant Superintendents, and the building Administrator responsible for addressing complaints of harassment on the basis of national origin at each audited school pursuant to the District's policies and procedures, as well as any other staff whom the District deems appropriate.

    Reporting Requirement:

    1. **By September 30, 2025,** the District will submit documentation to OCR demonstrating the District's compliance with the provisions outlined in Action Step H, including demonstration that the audit was conducted and the report was distributed to the identified staff. The District will promptly and fully address OCR's feedback, if any, until the District receives notice from OCR that no further reporting is required for this Reporting Requirement.

I. CLIMATE ASSESSMENT

1. By November 30, 2025 and 2026, the District will administer a school climate survey to all students enrolled in 6th through 12th grade. The climate check may be accomplished through the use of a written or electronic survey. Survey recipients must be notified of a contact person, such as a counselor, should they wish to discuss the survey or subject matter of the survey in person. The assessment will, at a minimum, address:

    a. The prevalence of harassment on the basis of race, color, and national origin, including on the basis of shared ancestry and ethnic characteristics, in the school;

b. The willingness to report incidents of harassment on the basis of race, color, and national origin, including on the basis of shared ancestry and ethnic characteristics, to District personnel;
c. The perception of the District's handling of reports and complaints of harassment; and
d. Suggestions for reducing incidents of harassment in the school and improvement of the District's response to reports and complaints of harassment.

2. After the climate survey is completed, the District will review the results to assess whether any additional student or other training is needed to further improve the school climate.

Reporting Requirements:

1. **At least 90 calendar days** before the scheduled climate survey administration date, the District will provide OCR with a copy of the proposed survey for OCR's review and approval. The District will promptly and fully address OCR's feedback, if any, until the District receives OCR's final approval of the survey and notice from OCR that no further reporting is required for Reporting Requirement I.1.

2. By November 30, 2025 and 2026, the District will administer the climate survey. Within 90 calendar days after the climate survey is conducted, the District will provide OCR a copy of the final survey along with a report summarizing the results of the survey, and a description of further activities, if any, the District plans to implement in response to the survey results. The District will promptly and fully address OCR's feedback, if any, until the District receives notice from OCR that no further reporting is required Reporting Requirement I.2.

J. CONSULTANT

1. The District will retain or designate one or more consultants (Consultants) with expertise on the issue of harassment of students based on national origin, including shared ancestry. The District will consider collaboration with, but is not required to collaborate with, the Mid-Atlantic Equity Consortium and/or U.S. Department of Justice, Community Relations Service (SPIRIT program). The Consultant(s) shall work with the District to assist in the development of the training referenced in Action Steps D, E, and F, and development of the school climate survey referenced in Action Step I, and to assist, if the District finds it necessary, in any other actions to prevent and address discrimination or harassment on the basis of shared ancestry at the District, and to timely, reasonably and effectively address incidents of discrimination or harassment based on shared ancestry. The Consultant(s) may be engaged by the District as independent contractor(s) for the District and/or as employee(s) of the District. The Consultant(s) will be approved by OCR. The District, after retaining its Consultant(s), shall promptly provide the Consultant(s) with all appropriate information the Consultant(s) believes is necessary to engage in this process. The District will work with the Consultant(s) to review current practices and procedures, assess the District climate with regard to shared ancestry discrimination and harassment, and develop a Plan to implement this Agreement which

will specify the dates for each action and the individual(s) responsible for implementing this Agreement, which can incorporate existing policies, trainings, and initiatives, as appropriate.

Reporting Requirements:

1. Before engaging a Consultant under this Agreement, the District will provide to OCR the name and credentials of the Consultant, for OCR review and approval. This will include documentation of the Consultant's expertise (i.e., a resume or curriculum vitae listing education completed on the topic of shared ancestry discrimination and harassment). If the District has already engaged one or more Consultant(s) the District is permitted to include those Consultants as part of this Reporting Requirement.

2. Within 90 days of signing this Agreement, the District will provide OCR with a draft of the Plan developed in collaboration with one or more Consultants, for OCR's review and approval. The Plan may incorporate steps already taken by the District toward meeting the terms of the Agreement, as appropriate.

3. Within 30 days of OCR's approval or earlier, the District will begin implementation of the Plan.

4. Within 60 days of receiving OCR's approval of the Plan, the District will provide OCR with documentation that it has begun to implement the Plan.

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The District understands that by signing this resolution agreement, it agrees to provide data and other information in a timely manner in accordance with the reporting requirement of this Agreement. Further, the District understands that during the monitoring of this Agreement, if necessary, OCR may visit the District, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the District has fulfilled the terms and obligations of this Agreement.

The District understands that OCR will not close the monitoring of this Agreement until OCR determines that the District has demonstrated compliance with all the terms of this Agreement and is in compliance with Title VI of the Civil Rights Act of 1964 (Title VI) and its implementing regulation at 34 C.F.R. Part 100, which were at issue in this complaint.

The District understands and acknowledges that OCR may initiate administrative enforcement or judicial proceedings to enforce the specific terms and obligations of this Agreement. Before initiating administrative enforcement (34 C.F.R. §§ 100.9, 100.10) or judicial proceedings to enforce this Agreement, OCR shall give the District written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

This Agreement will become effective immediately upon the signature of the District's representative below.

By: /s/_____ Date: 12/18/2024__ _____
Name: Tony B. Watlington Sr.
Title: Superintendent